



CIRNAC Comments to NIRB Re: Notice of Screening for Environment and Climate Change Canada’s “Coastal Surveys of Common Eider Nesting Islands in the Belcher Island Archipelago, Nunavut” Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
20YN007
Our file - Notre référence
CIDMS # 1284828

April 27, 2020

Mia Otokiak
Junior Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via NIRB public registry

Re: **Notice of Screening and Comment request for Environment and Climate Change Canada's "Coastal Surveys of Common Eider Nesting Islands in the Belcher Island Archipelago, Nunavut" Project Proposal**

Dear Mia Otokiak,

On April 15, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Environment and Climate Change Canada's "Coastal Surveys of Common Eider Nesting Islands in the Belcher Island Archipelago, Nunavut" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project Proposal and supporting documents and offers the responses below as it pertains to the NIRB's request:

Whether the Project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

Some common practices include:

- Waste to be kept inaccessible to wildlife at all times; and,
- Food particles should be removed from grey water to the extent possible before disposal (e.g., install filters on kitchen drains).



Any matter of importance to the Party related to the Project proposal;

Identification of Environmental Impacts Table

CIRNAC notes that the Proponent has not indicated in the 'Identification of Environmental Impacts Table' any potential impacts the Project's camp based operation activities may have on the following components:

- Sediment and soil quality;
- Vegetation; and,
- Birds, including habitat and migration patterns.

CIRNAC recommends that the Proponent provide rationale for leaving these sections empty, given that the Proponent intends to store fuel on land.

Spill Reporting Form Website Reference

CIRNAC notes that, in the Spill Response Plan, the 'General Actions' section references <http://www.nunavutwaterboard.org> while referring to the Nunavut Spill Report Form. CIRNAC recommends that the Proponent update the link to the spill response website, <https://www.gov.nu.ca/environment/documents/spill-response>, where the Nunavut Spill Report Form can be found.

Interactions Summary

The 'Community Involvement and Regional Benefits' section of the Project Application indicates the Proponent was in communication with the Sanikiluaq Hunters and Trappers Association on two occasions, a three day meeting commencing January 14, 2020 and on February 12, 2020. No details are provided on what was discussed during these interactions in terms of community involvement and regional benefits.

CIRNAC recommends that the Proponent provide a brief written summary of its interactions to date with interested parties from the community of Sanikiluaq, including the Sanikiluaq Hunters and Trappers Association. This summary should describe meeting dates, means of interaction (e.g., telephone call, email correspondence, in-person, etc.), discussion topics, and any agreed upon next steps.

Communications with Land Users

CIRNAC recommends that the Proponent maintain open communication with local land users from Sanikiluaq, as well as the Qikiqtani Inuit Association and other interested parties to ensure they are familiar with planned activities and their interests are respected (e.g., the protection of wildlife resources). In particular, the following points should be explored to promote the participation of local Inuit in Project activities:



- Incorporation Inuit knowledge or Inuit Qaujimajatuqangit in the Project design;
- Briefing community members on planned activities;
- Briefing community members on monitoring results; and
- Training and employment opportunities for community members.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

